

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
vs.) NO. 04-30034-MAP
)
MICHAEL CROOKER)

MOTION TO CONTINUE

Now comes the defendant in the above entitled matter and moves this Honorable Court for a continuance of the date set for the Motion Hearing on May 31, 2006 at 12:30, and asserts as his basis, therefore, the following;

Counsel for the defendant is currently scheduled for trial in Springfield District Court in the matter of Commonwealth v. Tougias, Docket No. 0423-CR-12284. This matter has been continued on prior occasions. It involves 16 witnesses, one of which is a physician expert witness subpoenaed by the defendant.

Counsel was previously unaware of this conflict because of a clerical error in his schedule calendar.

Counsel has attempted to confer with AUSA Kevin O'Regan, but he is presently out on leave until May 30, 2006.

WHEREFORE, counsel for the defendant requests a continuance to another date during the week of May 30, 2006 that is convenient to all parties.

THE DEFENDANT

BY:/s/ Vincent A. Bongiorno, Esq.
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Springfield, MA. 01103
(413) 732-0222
BBO #049040

CERTIFICATE OF SERVICE

I, Vincent A. Bongiorno, Esq., do hereby certify that I have served a copy of the foregoing via CM/ECF to Assistant United States Attorney, Kevin O'Regan, Esq., United States District Court, 1550 Main Street, Springfield, Ma. 01103 this 25th day of May 2006.

/s/ Vincent A. Bongiorno